

From: [Garyg Miller](#)
To: [Christine Poore](#)
Cc: [Amy Legare](#); [Barbara Nann](#); [Dipanjana Bhattacharya](#); [Kevin Shade](#); [Susan Roddy](#)
Subject: Re: Gulfco Remedial Alternative Memo
Date: 01/06/2011 12:53 PM

Thanks Christine

Gary Miller, P.E.
Remediation Project Manager
EPA Region 6 - Superfund (6SF-RA)
(214) 665-8318
miller.garyg@epa.gov

▼ Christine Poore---01/06/2011 12:36:58 PM---Hi Gary, I've read through the Memo you provided and looked over the Presumptive Remedy Guidance. M

From: Christine Poore/DC/USEPA/US
To: Garyg Miller/R6/USEPA/US@EPA
Cc: Amy Legare/DC/USEPA/US@EPA
Date: 01/06/2011 12:36 PM
Subject: Re: Gulfco Remedial Alternative Memo

Hi Gary,
I've read through the Memo you provided and looked over the Presumptive Remedy Guidance. My main concern is that the impoundments never accepted any municipal wastes, so I'm having a hard time with calling them that. It appears that they only received industrial wastes from the barge cleaning operations, and since there wasn't any detailed COC or concentration information in the Memo we can't tell the material that remains is or is not hazardous.

Additionally in 40 CFR 257.2, municipal solid waste landfill unit is defined as "a discrete area of land or an excavation that receives household waste, and that is not a land application unit, surface impoundment, injection well, or waste pile as those terms defined in this section." I think the impoundments/lagoons would fall under the term "surface impoundment" because they were "designed to hold an accumulation of liquid wastes..." (40 CFR 257.2), as described in the memo (Page 4 indicates that the lagoons were used for the storage of wash water generated from barge cleaning operations).

Because of this, I don't think that the impoundments are municipal landfills and can be addressed through the presumptive remedy process for CERCLA municipal landfill sites. I know that the impoundments contain a heterogeneous mixture of contaminants, but they were only used for industrial wastes. The remedy may be the same, but it should probably be done through the ROD process with a full nine-criteria evaluation.



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Please let me know if you would like to discuss this site further.
Thanks!

Christine Poore
Superfund Site Assessment and Remedy Decision Branch
703-603-9022

▼ Garyg Miller---01/03/2011 02:36:21 PM---Hi Christine, Here is the draft doc I mentioned today in case you wanted to look at it.

From: Garyg Miller/R6/USEPA/US
To: Christine Poore/DC/USEPA/US@EPA
Date: 01/03/2011 02:36 PM
Subject: Gulfco Remedial Alternative Memo

Hi Christine,

Here is the draft doc I mentioned today in case you wanted to look at it.

Thanks,

Gary Miller, P.E.
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[attachment "Draft Gulfco Remedial Alternatives Memo 12-17-10.pdf"
deleted by Christine Poore/DC/USEPA/US]